

Exhibit D

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF MISSISSIPPI
OXFORD DIVISION

DR. AMY R. WOODS

PLAINTIFF

VS

CIVIL ACTION NO. 3:19-CV-00234-NBB-RP

MHM HEALTH PROFESSIONALS, LLC, D/B/A
CENTURION PROFESSIONALS;
MANAGEMENT & TRAINING CORPORATION
JESSE WILLIAMS, INDIVIDUALLY;
AND JOHN DOES 1-9

DEFENDANTS

ZOOM DEPOSITION OF BEVERLY McMULLEN

Taken at the Instance of the Plaintiff
With All Parties Appearing by Zoom Videoconferencing
On August 3, 2020
At 10:00 a.m.

REPORTED BY: SHARRON F. ALLEN, CSR, RPR
CSR NO. 1144

1 A. Good morning.

2 Q. I'm Jim Waide, and I'm here with my
3 wife, Rachel Waide. I don't think you can see
4 her, probably, but we're here representing
5 Dr. Woods.

6 We never have met before as far as I
7 know, have we?

8 A. I don't think so. No, sir.

9 Q. By whom are you employed?

10 A. I'm employed with Management & Training
11 Corporation at the Marshall County Correctional
12 Facility.

13 Q. About when did you start to work for
14 Management & Training Corporation?

15 A. I started to work for Management &
16 Training Corporation August of 2012.

17 Q. What is Management & Training
18 Corporation?

19 A. It's a private company that is
20 contracted with the State of Mississippi. It
21 houses state offenders.

22 Q. It has a contract with the State of
23 Mississippi?

24 A. That's correct.

25 Q. Does it have one contract to deal with

1 a medical doctor now assigned to take care of
2 the prisoners at the Marshall County
3 Correctional Facility?

4 MR. LONG-DANIELS: Objection to the
5 form.

6 A. I'm not saying that. I'm saying that
7 they're not on-site every day.

8 BY MR. WAIDE:

9 Q. Okay. There's no medical doctor now
10 assigned every day to take care of the prisoners
11 at the Marshall County Correctional Facility?

12 MR. LONG-DANIELS: Objection to form.

13 BY MR. WAIDE:

14 Q. Am I correct?

15 MR. LONG-DANIELS: Same objection.

16 A. Not every day, sir.

17 BY MR. WAIDE:

18 Q. All right. So as far as taking care of
19 the serious medical needs of prisoners, do you
20 agree with me that it would be better to have a
21 medical doctor, a licensed medical doctor,
22 assigned to the facility on a permanent basis if
23 a company is interested in taking care of the
24 serious medical needs of prisoners?

25 MR. PEEPLES: Object to form.